

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Richmond Division

UNITED STATES OF AMERICA)	
)	
)	Case No. 3:19cr130
)	
OKELLO T. CHATRIE,)	
Defendant)	

**JOINT STATUS REPORT REGARDING RESCHEDULING
THE GEOFENCE MOTION HEARING**

Okello Chatrie, through counsel, submits the following joint status report regarding rescheduling the geofence motions hearing after consulting with the government, represented here by Kenneth Simon, Peter Duffey, and Nathan Judish:

1. Later today, the defense will be submitting a subpoena duces tecum pursuant to Federal Rule of Criminal Procedure 17 requesting information related to the second declaration that Google had filed from Mr. McGriff in ECF No. 110-1. The subpoena application requests that Google provide this information within two weeks. The parties currently anticipate being able to be prepared for the rescheduled hearing by August 2020.
2. Counsel for the defense and the government have conferred. Counsel and currently anticipated witnesses are all available August 4-7, 2020; and August 24, 2020. While less preferable for one government witness, August 19-21, 2020, are also available if necessary.

Thus, the parties ask that the Court reschedule the hearing on the geofence motion for anytime August 4-7, 2020, and August 24, 2020, or August 19-21, 2020, if necessary. If none of those dates are available for the Court, counsel will, of course, confer again.

Respectfully submitted,

OKELLO T. CHATRIE

By: /s/

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